

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY,

Plaintiff,

V.

HARMAN INTERNATIONAL INDUSTRIES,  
INCORPORATED,

Defendant.

Civil Action No. 05-10990-DPW

**ASSENTED-TO MOTION TO FILE UNDER SEAL HARMAN'S OBJECTIONS  
TO THE REPORT AND RECOMMENDATION ON DEFENDANT'S MOTION  
FOR SUMMARY JUDGMENT OF UNENFORCEABILITY DUE TO MIT'S  
ALLEGEDLY INEQUITABLE CONDUCT**

Pursuant to the Parties' Stipulated Protective Order entered by the Court, defendant Harman International Industries, Inc. ("Harman") moves that the Court seal the full version of Harman's Objections to the Report and Recommendation on Defendant's Motion for Summary Judgment of Unenforceability Due to MIT's Allegedly Inequitable Conduct until the conclusion of this case. A redacted version of Harman's Objections to the Report and Recommendation on Defendant's Motion for Summary Judgment of Unenforceability Due to MIT's Allegedly Inequitable Conduct will be filed electronically and publicly with the Court. This Motion is necessary to comply with the protections of the Stipulated Protective Order.

WHEREFORE, Harman respectfully requests that the Court enter an Order permitting Harman to file under seal the unredacted version of Harman's Objections to the Report and Recommendation on Defendant's Motion for Summary Judgment of Unenforceability Due to MIT's Allegedly Inequitable Conduct.

Date: November 21, 2007

Respectfully submitted,

/s/ Courtney A. Clark

Robert J. Muldoon, Jr., BBO# 359480

Courtney A. Clark, BBO# 651381

SHERIN AND LODGEN, LLP

101 Federal Street

Boston, MA 02110

William A. Streff, Jr., P.C.

Michelle A.H. Francis

Craig D. Leavell

Jamal M. Edwards

Colleen M. Garlington

Joanna Belle Gunderson

KIRKLAND & ELLIS LLP

200 East Randolph Drive

Chicago, IL 60601

(312) 861-2000 (phone)

(312) 861-2200 (fax)

*Attorneys for Defendant*

*Harman International Industries, Incorporated*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

Harman, by and through its attorneys, hereby certifies that it conferred with MIT's counsel on November 21, 2007, and counsel for MIT has assented to this Motion.

/s/ Courtney A. Clark

Courtney A. Clark

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on November 21, 2007.

/s/ Courtney A. Clark

Courtney A. Clark